

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS,

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS-HARVARD  
FACULTY CHAPTER,

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS AT NEW  
YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS-AMERICAN  
FEDERATION OF TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as  
Secretary of State, and the DEPARTMENT  
OF STATE,

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, and the  
DEPARTMENT OF HOMELAND  
SECURITY,

TODD LYONS, in his official capacity as  
Acting Director of U.S. Immigration and  
Customs Enforcement,

DONALD J. TRUMP, in his official capacity  
as President of the United States, and

UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 1:25-cv-10685-WGY

**DECLARATION OF SCOTT WILKENS FOR LEAVE TO APPEAR PRO HAC VICE**

Pursuant to Local Rule 83.5.3, I, Scott Wilkens, submit this certificate in support of my application, on motion of Edwina Clarke, for leave to appear and practice in this Court in the above-captioned case.

1. I am a member of the bar in good standing in every jurisdiction where I am admitted to practice. I was admitted to the New York Bar in 2022 and am a member in good standing. I am also a member in good standing of the California Bar, the District of Columbia Bar, the United States District Courts for the District of Columbia, Southern District of California, Northern District of California, Southern District of New York, and Eastern District of New York, the United States Courts of Appeals for the Second, Third, Fourth, Fifth, Seventh, Ninth, Eleventh, and District of Columbia Circuits, and the Supreme Court of the United States.

2. There are no disciplinary proceedings pending against me in any jurisdiction.

3. I have not had any previous admission for a limited purpose or admission *pro hac vice* to this Court revoked for misconduct.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts and agree to comply with them.

5. Edwina Clarke at Zimmer, Citron & Clarke, LLP, a member in good standing of the bar of this Court, is also counsel of record in this case.

I certify under penalty of perjury that the foregoing is true and correct.

Executed May 5, 2025  
New York, New York

/s/ Scott Wilkens  
\_\_\_\_\_  
Scott Wilkens